

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

In re:)
)
) **CASE NO. 18-18430-pmm**
Charlita A. Andrews)
Debtor) **JUDGE Patricia M. Mayer**
)
)

**NewRez LLC d/b/a Shellpoint Mortgage Servicing NOTICE OF DEBTOR'S
REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 04/01/21 through 06/01/21. Creditor holds a secured interest in real property commonly known as 1108 Rhodora Ave., Reading, PA 19605-1350 as evidenced by claim number 9-3 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 07/01/21 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Robertson, Anschutz, Schneid, Crane & Partners, PLLC

Attorney for Secured Creditor
10700 Abbott's Bridge Rd., Suite 170
Duluth, GA 30097
Telephone: (470) 321-7112
By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esquire
PA Bar Number 314532
Email: cwohlab@raslg.com

UNITED STATES BANKRUPTCY COURT

**EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

In re:

Charlita A. Andrews
Debtor

)
)
) **CASE NO. 18-18430-pmm**
)
) JUDGE Patricia M. Mayer
)
)

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for
Forbearance* was served upon the following parties in the following fashion on this 27th day of
July 2021:

Charlita A. Andrews
1108 Rhodora Ave
Reading, PA 19605-1350

And via electronic mail to:

JAMES W. ZERILLO
Zerillo Law Offices
937 North Hanover Street
Pottstown, PA 19464

SCOTT F. WATERMAN (Chapter 13)
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esquire
PA Bar Number 314532
Email: cwohlab@raslg.com